

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

CONSEJO DE SALUD DE PUERTO RICO,
INC., doing business under its trade name
Med Centro, COMMONWEALTH OF
PUERTO RICO, Eduardo Martinez-Tull,
Victor Montalvo-Martell,

Plaintiffs,

Vs

UNITED STATES OF AMERICA, ALEX
M. AZAR, in his official capacity of the
Department of Health and Human Services,

Defendants.

CIVIL NO. 18-cv-1045 (GAG)

RESPONSE IN OPPOSITION TO DEFENDANTS MOTION TO DISMISS

TO THE HONORABLE COURT:

COME NOW CONSEJO DE SALUD DE PUERTO RICO, INC. (“Med Centro”),
EDUARDO MARTINEZ-TULL, VÍCTOR MONTALVO-MARTELL, herein referred to
as the “original Plaintiffs,” by and through their attorneys, and most respectfully STATE,
ALLEGE AND PRAY:

For the reasons set forth in the accompanying memorandum of law, the original
Plaintiffs respectfully request from this Honorable Court to DENY Defendants *Motion to
Dismiss* docketed as Docket No. 20.

I HEREBY CERTIFY that, on this same date, the undersigned attorney filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for all parties in this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, July 5, 2018.

s/ Ignacio Fernández de Lahongrais

IGNACIO FERNANDEZ
LAHONGRAIS

USDC - PR 211603

Capital Center Sur, Suite 202

Avenida Arterial Hostos #239

San Juan, Puerto Rico 00918-1475

Tel. 787-923-5789

ignacio@bufetefernandezalcaraz.com

s/ José Oswaldo Coll*

DEJOSE OSWALDO COLL

PO Box 432

Mercedita, Puerto Rico 00715-0432

Tel. 787-843-1301

joccoll1@gmail.com

**Attorney to be admitted Pro Hac Vice*